

The Law Offices of
DAVID CLIFFORD HOLLAND
A Professional Corporation
Member of New York, New Jersey, and Maryland Bars

November 8, 2017

BY ECF FILING:

The Hon. Alvin K. Hellerstein
US District Court Judge
500 Pearl Street
New York, New York 10007

Re: *Washington v. Session - 17-cv-05625 (AKH)*
Request For Extension Of Time To Interpose Opposition and Reply
To Government's Pre-Answer Motion to Dismiss

Dear Judge Hellerstein:

On behalf of Plaintiffs, and with the consent of the Government, I am writing to you respectfully requesting that the dates for interposing opposition and a reply related to the Government's Pre-Answer Motion to dismiss be extended to the dates set forth below

The reasons for the extension are necessary because the members of Plaintiffs' *pro bono* legal team have been experiencing health related issues, engaged on trial, and also campaigning in an election contest outside of New York City. As such, Plaintiffs' counsel are not able to adequately address the issues raised by the Government's dismissal motion by Friday, November 10, 2017, as presently scheduled.

As agreed to by AUSA Samuel Dollinger, Plaintiffs request that the deadline by which to interpose opposition to the Government's dismissal motion be extended to Monday, November 27, 2017, and the Government's deadline to submit a Reply extended to Monday, December 11, 2017.

Such an extension ensures that all counsel are able to fully and adequately address the significant legal issues presented at this stage of the matter.

Please do not hesitate to contact me at the number below if there are any questions or concerns of the Court that I may address with regards to this request.

Sincerely,

/s/

David C. Holland, Esq.

